6.0 DETAILED DISCUSSION OF ENVIRONMENTAL IMPACTS

The following information supplements the discussion of environmental impacts, including cumulative environmental effects, which is presented in the Sunrise DEIR/DEIS and FEIS.

6.1 Introduction to Detailed Discussion of Environmental Impacts

As indicated in the CPUC's "Information and Criteria List": "The PEA may incorporate material by reference when to do so would reduce bulk without impeding agency or public review. Any such incorporation shall, however, include a summary of the matter to which reference is made and an explanation of its relevance to the project. No material may be incorporated by reference unless it is reasonably available, or is made reasonably available for inspection by the Commission and potentially interested members of the public. All or any part of any Environmental Impact Statement (EIS) prepared pursuant to the National Environmental Policy Act of 1969 (NEPA), or any EIR or Master Environmental Assessment prepared pursuant to CEQA, may be submitted in lieu of all or any part of the PEA required by this rule, provided the requirements of all applicable sections of these Information and Criteria Lists are fully satisfied."

Since the projects examined in this PEA are as generally described and contemplated in the FEIS and Sunrise DEIR/DEIS, the Applicant has elected to avail itself of the authorization (for the utilization of NEPA and CEQA documentation) provided therein.

6.2 Detailed Discussion of Environmental Impacts

The following environmental documents are incorporated by reference and constitute the Applicant's detailed discussion of the projects' potential environmental impacts: (1) "Final Environmental Impact Statement for Hydropower License – Lake Elsinore Advanced Pumped Storage Project, FERC Project No. 11858, FERC/EIS-0191F" (FERC, January 2007); and (2) "Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment – San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58" (CPUC/BLM, January 2008).

6.3 Cumulative Impacts

6.3.1 Geographic Scope

The geographic area potentially impacted by a proposed action likely varies with the nature of the proposed action, the severity of the environmental effect, the resource considered, and the environmental affected. Similarly, in the context of cumulative environmental effects, when the effects of the proposed action are considered in combination with those of other past, present, and reasonably foreseeable future projects, the geographic extend of the potentially affected environment may also vary. The general geographic area potentially impacted by the environmental effects of the proposed projects can be used to define the boundaries of the area considered in the assessment of potential cumulative impacts.

For the purpose of this PEA, presented in <u>Table 6-1</u> (Generalized Geographic Scope of Cumulative Impacts) is the general geographic area associated with the different resources addressed herein. Although each of the related projects will continue to produce impacts attributable to those projects, the geographic area of those impacts may be so removed from the proposed projects as not to produce a potentially significant cumulative environmental

effect. With regards to each of the resources examined in this PEA, the inventory of related projects is based on the corresponding geographic area defining the possibility of materially contributing to a significant cumulative impact.

Table 6-1

GENERALIZED GEOGRAPHIC SCOPE OF CUMULATIVE IMPACTS

Resource	Geographic Area
Aesthetics	Local
Agricultural Resources	Regional
Air Quality	Regional (air basin) and local
Biological Resources	Regional (ecoregion) and local
Cultural Resources	Local
Geology and Soils	Local
Hazards and Hazardous Materials	Local
Hydrology and Water Quality	Regional (watershed) and local
Land Use and Planning	Regional and local
Mineral Resources	Regional
Noise	Local
Population and Housing	Regional and local
Public Services	Local
Recreation	Local
Transportation and Traffic	Regional and local
Utilities and Service Systems	Local
Energy Resources	Regional and local

Source: Elsinore Valley Municipal Water District

6.3.2 Cumulative Impacts

Aesthetics

As reported by the Forest Service: "Scenery is different than many resources. When vegetation is removed, for example, it grows back in a given number of years; additional vegetation removal after that point would have no cumulative effects. Projects that result in permanent changes to landscape character (including utility lines) tend to be progressive, never returning to the original character unless the facilities are removed. As projects are added to landscapes, there tends to be a gradual decline in visual quality. And generally there is no precise point at which one additional project is 'too much." The cumulative effects of transmission lines "on visual resources may seem relatively small; just one new utility line running through thousands of acres of natural-appearing landscapes. But both individual and cumulative impacts of relatively small projects on visual quality can be significant.¹

As development occurs, the aesthetic character of the areas that experience that development also change. Open space areas and areas exhibiting a rural character become urbanized and

¹/ United States Department of Energy, United States Department of the Interior Bureau of Land Management, United States Department of Agriculture Forest Service, Final Environmental Impact Statement - Tucson Electric Power Company Sahuarita-Nogales Transmission Line, DOE/EIS-0336, BLM Reference No. AZA 31746, January 2005, pp. I-12 and I-13.

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suburbanized. The diminution in the regional inventory of available vacant and natural lands constitutes the continuation of historic development patterns and not a substantial departure from those trends.

County and local governmental land-use entities formulate long-range planning documents with the intent of directing development and redevelopment activities to those areas most conducive to growth, based on a variety of planning considerations. Separate formal planning and environmental review processes exist when a development proposal seeks to modify those adopted long-range plans. No development is authorized to occur in the absence of compliance with adopted agency plans and policies. Compliance with and conformity to adopted plans and policies helps to mitigate the potential cumulative impacts produced by the visual changes to existing landscapes associated with future development and redevelopment activities. As a result, while the further intensification of the region may constitute an adverse impact, the incremental and inevitable changes resulting from those activities would not be deemed a significant, cumulative impact on the region's existing visual resources.

Since none of the threshold of significance criteria would be exceeded, the identified impact will be less than significant and no further mitigation is recommended or required.

Agricultural Resources (Cumulatively Significant)

Development of the proposed projects, in combination with other related projects and the progressive urbanization of the southern California region, will result in the continuing conversion of Prime Farmland. Unique Farmland, and Farmland of Statewide Importance to urban uses. As reported, California has 100 million acres of land, split almost evenly between public and private ownership. About one-half of the private land is used for agriculture (27 million acres) and about one-third of the public land is in grazing allotments (16 million acres). About 43 million acres of the State's lands are in agriculture, compared to about 5.5 million acres in urban use. On average, between 1988 and 1998, 49,700 acres of farmland in California was converted to non-farm use.² In comparison, the National Resources Conservation Service which reports that, between 1992 and 1997, the State's "developed acres" increased at a rate of about 112,000 acres per year.³

It is projected that the "best cropland is more likely to be converted to urban uses." Between 1988 and 1998, although representing only about 18 percent of the State's total agricultural land, prime cropland accounted for about 30 percent of farmland acres that were converted. Although representing only 25 percent of the State's agricultural land base, other cropland constituted 36 percent of conversions. In contrast, grazing acreage accounted for 34 percent of converted acres but constituted 57 percent of the agricultural land base. While grazing land is generally more remote, prime farmlands are more generally more suitability for development and proximity to existing development.⁴

It is, therefore, evident that areawide development is resulting and will continue to result in the conversion of designated Farmland, as shown on the FMMP maps, to non-agricultural use. It is noted that: "Farmland conversion is a serious issue in California. The evidence shows that its effects are more long-term than immediate, more visible in particular localities than Statewide, and involve more than direct agriculture-to-urban change. In the future, more land may be

²/ Kuminoff, Nicolais, Sokolow, Alvin D., and Sumner, Daniel A., Farmland Conversion: Perceptions and Realities, University of California, Agricultural Issues Center, Vol. 16, May 2001, p. 1.

3/ Ibid., p. 2.

⁴/ *Ibid.*, pp. 3-4.

taken out of production because of limited water supply and for habitat restoration than because of urban expansion." Additional Statewide policies and local land-use planning efforts are needed to prevent the loss of additional Farmlands. Since those efforts cannot be readily implemented at the project level, there exists no feasible mitigation measures that would reduce cumulative impacts upon agricultural resources to a less-than-significant level.

Air Quality (Cumulatively Significant)

As indicated in <u>Table 4-3</u> (Attainment Designations - Western Riverside County and Northern San Diego County, the SCAB is classified by the USEPA as an extreme non-attainment area for ozone (1-hour), severe non-attainment area for ozone (8-hour), serious non-attainment area for CO and PM_{10} , and a non-attainment area for $PM_{2.5}$. The SCAB is classified by the State as non-attainment for ozone (1-hour), extreme non-attainment for ozone (8-hour), and non-attainment for $PM_{2.5}$ and PM_{10} . Similarly, the SDAB is classified by the USEPA and non-attainment for ozone (8-hour) and classified by the State as non-attainment for ozone (1-hour and 8-hour), and for $PM_{2.5}$ and PM_{10} .

Construction and operation of other related projects would further degrade the air quality of the SCAB and SDAB. As a result of the generation of emissions associated with the use of construction equipment and fugitive dust associated with ground-disturbing activities, air quality would be locally degraded during construction activities. The greatest cumulative impact on air quality would, however, be the result of the incremental addition of mobile source pollutants from increased traffic from residential, commercial, and industrial development associated not only with other related projects but also from anticipated areawide development. Areawide mitigation will primarily come from the implementation of traffic demand management (TDM), transportation system management (TSM) and other regional air quality strategies.

Based on the non-attainment status of the SCAB and SDAB and the absence of feasible mitigation measures that can be implemented at the project level to substantially reduce mobile source emissions, cumulative air quality impacts constitute a significant unmitigable environmental effect.

Biological Resources (Cumulatively Significant)

As indicated in SCAG's "Regional Comprehensive Plan and Guide," "[m]uch of Southern California's biological diversity has been lost during the past several decades. Future development necessitated by the predicted growth in the region will place demands on the remaining resources." SCAG further notes: "Southern California ecosystems, mostly those on the lower elevations and gentle slopes of urbanizing areas, are shrinking, becoming fragmented, and not being managed to the point that many are in danger of serious dysfunction and hundreds of plant and animal species have become candidates for listing under the Endangered Species Acts. The potential for more species to be listed will continue to increase as more lands get converted to urban development. Non-native plants and animals are invading many sensitive habitats and are displacing native species."

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⁵/ *Ibid.*, p. 7.

⁶/ Southern California Association of Governments, Regional Comprehensive Plan and Guide, March 1996,

⁷/ *Ibid.*, p. 9-31.

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This incremental reduction contributes to the progressive fragmentation of habitat areas and decline in species diversity throughout southern California. Existing undeveloped properties containing native habitat areas, therefore, take on increased importance relative to their role in sustaining viable plant and wildlife communities and providing wildlife corridors for those remaining animal species indigenous to the southern California area. From a long-term, regional or subregional context, the continuing urbanization will adversely and significantly impact the area's existing biological resources.

Implementation of the proposed projects, in combination with other reasonably foreseeable future projects, will contribute incrementally to the continuing reduction in relatively natural, undisturbed open space areas found throughout southern California. Since each related project is subject to independent environmental review, to the extent those related projects are determined by the corresponding permit entity to produce adverse impacts on existing biological resources, there exists a reasonable expectation that related project-specific mitigation measures would be imposed by that entity to reduce those biological resource effects to the maximum extent feasible. Notwithstanding those project-level efforts, the long-term, areawide loss of biological resources attributable to future development will produce a significant cumulative impact on those resources that are affected and result in added stress to those resources that remain.

Although deemed to be significant, there exist no feasible mitigation measures that can be implemented to effectively address this cumulative impact other than through the imposition of additional regional growth management and/or resource conservation policies. Those actions cannot feasibly be implemented at the project level.

Cultural Resources

All related project activities remain subject to site-specific environmental review and must fully conform to and comply with all applicable local, State, and federal requirements. Compliance with those requirements will ensure that all related project-specific and cumulative impacts upon prehistoric and historic resources are mitigated to a less-than-significance level.

Geology and Soils

Geotechnical impacts are generally site specific and project specific in nature. Implementation of the proposed projects would, therefore, not result in any significant cumulative geotechnical impacts affecting or potentially affecting other off-site areas. Similarly, implementation of other related projects would neither result in any further project-related geotechnical impacts nor increase the severity of any identified impacts.

Adequate control measures have been formulated by State and local governmental entities to ensure that all public and private structures are constructed and maintained in recognition of site-specific, area-specific, and regional geologic, geotechnical, seismic, and soils conditions. Compliance with applicable UBC standards and associated permit-agency requirements will mitigate potential cumulative impacts to below a level of significance.

Hazards and Hazardous Materials

Hazards and hazardous material impacts are generally localized (site-specific) to the area of each identified hazard and/or material. Compliance with regulatory requirements will ensure that known and project-related hazards are avoided or reduced to the maximum extent feasible,

that workers and the public operate in a relatively safe environment, and hazardous materials are properly handling and storage during the construction and operation of both the proposed projects and other related projects. As such, cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

Adequate design and development control measures, including design specifications and associated BMPs, have been formulated by and are implemented by the Counties of Riverside and San Diego to ensure that all public and private drainage facilities and structures are constructed and maintained in recognition of applicable project-related and cumulative hydrologic conditions and drainage flows. Other related projects within affected watersheds will be required to provide an appropriate site-specific response to any storm water impacts attributable to those activities.

Additionally, all related projects are subject to compliance with the narrative and quantitative water quality objectives, antidegradation, and beneficial use provisions specified in the SARWQCB Basin Plan and SDRWQCB Basin Plan. The proposed projects and other related project are further subject to the "General Permit for Stormwater Discharges Associated with Construction Activities" and to other applicable NPDES permits, including the waste discharge requirements for urban runoff specified therein.

Compliance with Riverside County Flood Control and Water Conservation District and County of San Diego Department of Public Works standards, ordinance, specification, and requirements will reduce potential cumulative drainage impacts to a less-than-significant level.

Land Use and Planning

As indicated in SCAG's "Regional Comprehensive Plan and Guide" and SANDAG's "Regional Comprehensive Plan: Establishing a Baseline for Monitoring Performance," the southern California region will continuing to undergo rapid urbanization in response to regional growth. The proposed projects, in combination with other related projects, are characteristic of the development activities predicted and addressed therein.

In order for development to proceed, each respective permitting entity will need to affirmatively determine that the proposed action before them complies with existing statutory and regulatory requirements, as well as with agency plans, policies, standards, and guidelines. Where deviations exist, applicants can request that agency plans be modified to accommodate individual development requests and/or development requests can be modified to better respond to existing agency plans. Development cannot proceed in the absence of a conformity determination. As a result, although these activities will transform their respective sites, these activities will not result in any cumulative land use impacts.

Mineral Resources

Construction and construction products involves the use of and reasonable access to mineral resources. Implementation of the proposed projects, in combination with other related projects, will, therefore, impose additional demands on mineral resources, including construction aggregate. Under CEQA, agencies are required to mitigate the significant impacts of their discretionary actions. To the extent that areas subject to development review contain know

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mineral resources, each related project's impacts upon those resources would need to be considered by the permitting agency.

Development activities that occur in proximity to mineral resources can, as a result of the introduction of incompatible uses or the placement of structures atop those resources, result in their forfeiture for potential harvest. Studies have shown that, throughout southern California, projected demand for construction aggregate exceeds existing supplies, predicating the need for the transport of those materials from other areas. The loss of availability of a locally important mineral resource recovery site would constitute a significant environmental effect.

One of the projects' alternative transmission alignments would traverse an active clay mining area (Pacific Clay) and, if developed, would have the potential to predicate the premature cessation of mining activities within proximity to individual tower sites located within that existing extraction area. If construction were to occur prior to the termination of that property's surface mining permit or extraction of all feasibly extracted materials, the resulting impact would be deemed significant. A significant project-level impact might further suggest that a cumulative impact might then exist. Conversely, to the extent that the alternative transmission alignment through the Pacific Clay property were not to be selected, the projects' impacts on existing mineral resources would be less than significant.

Both SANDAG's "Final Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region, SCH No. 2004011141" and the County of Riverside's "Final Program Environmental Impact Report, Riverside County General Plan Update, EIR No. 441, State Clearinghouse No. 2002051143" have concluded that projected development anticipated throughout San Diego and Riverside Counties will not result in a significant environmental effect upon mineral resources. Cumulative impacts upon mineral resources attributable to those related projects identified herein would, therefore, not be significant.

Noise

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that disrupts or interferes with normal human activities. Although exposure to high noise levels over an extended period has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, the perceived importance of the noise, and its appropriateness in the setting, the time of day, the type of activity during which the noise occurs, and the sensitivity of the individual.

During the projects' construction, construction noise will be audible beyond the facilities' boundaries at along local streets used to transports materials and equipment. Noise impacts are generally localized, limited to the area near the source, and decrease as the distance between source and receptor increases. This phenomenon is known as "spreading loss" or "atmospheric attenuation." Because of the logarithmic nature of the decibel (dB) unit, sound levels cannot be added or subtracted directly. The combined effect of several equipment types operating simulataneously is not represented by the sum of the individual noise levels but is calculated based on the logarithmic sale of decibels. If a sound's intensity is doubled, such as

⁸/ Sound dissipates exponentially with distance from the noise source. For a single "point source," sound level decay about 6 decibels for each doubling of distance. From a "line source," such as traffic, the sound decreases by about three decibels for each doubling of distance in a hard-site environment. Line source noise in a relatively flat environment with absorptive vegetation (soft site) decreases by about 4.5 decibels for each doubling of distance. Most areas actually contain both hard and soft elements and the spreading loss is usually between these two values.

associated with a doubling of traffic volumes along a street segment, the sound level increases by only 3 dB, regardless of the initial sound level.

Related projects will contribute to the noise environment in proximity to those projects and along those roadways impacted by construction and operational traffic. Only those related projects located in close proximity to the proposed projects, however, have the potential to cumulatively contribute to noise attributable to the proposed projects. Because most of the related projects are not located near the proposed projects, the combined effects of the proposed projects and other related projects would not be anticipated to be cumulatively significant.

Population and Housing

As described in <u>Section 9.0</u> (Growth Inducing Impacts of the Proposed Action), the proposed projects are not, in and of themselves, growth inducing. For the same reasons as associated with the proposed projects, other related energy facilities would not result in a significant growth-inducing impact. Additionally, neither the related projects nor other areawide development would be anticipated to displace a substantial number of people and/or existing housing units, necessitate the construction or replacement housing.

A number of nearby development projects have been identified, including the Alberhill Ranch Specific Plan, Alberhill Ranch Country Club Specific Plan, East Lake Specific Plan, La Laguna Estates Specific Plan, Sycamore Creek Specific Plan, and Tract Map Nos. 22626. Each of those projects is subject to local approval. The approving land-use entity must made an affirmative finding that each related project is consistent with the local agency's general plan. Local general plans are used by regional planning entities as the bases upon growth projections are derived. Although a substantial number of new housing units will be added to the area's housing inventory and a substantial number of new residents will be added to the general projects' area, that increase would not be expected to exceed areawide growth projections. As such, cumulative population and housing impacts would be significant.

Public Services

Wildfire hazards exist in those urban-interface areas located throughout the general area. Continued regional growth and changing climatic conditions suggest that those hazards will increase in the future as more people elect to reside in proximity to "very high hazard severity zones" and recreation in areas susceptible to wildland fires conditions. As indicated in the "California Fire Plan": "Risk of wildfire to life, property, natural resources, and firefighter safety is increasing. Population will grow and more people will live and use wildland areas, especially in the Central Sierra and in the southern California Counties of Riverside, San Bernardino, and San Diego. Topography and climate support ecosystems where large wildfires can be expected. Drought and fuel moisture conditions will be unpredictable but almost always dangerous in the fire season. More structures will be constructed in areas that are very susceptible to wildfires."

As indicated by the Forest Service, "88 percent of the vegetation on the Cleveland National Forest is chaparral. . .Chaparral areas are dynamic plant communities characterized by relatively frequent wildfires. Many plant communities found in chaparral are dependent on fire

⁹/ California Department of Forestry and Fire Protection, California Fie Plan – A Framework for Minimizing Costs and Losses from Wildland Fires, Report to the California Board of Forestry, 1996, pp. 6-7.

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to maintain their productivity and diversity." As such, wildfires in the CNF are both likely to be inevitable and their occurrence serves an important biological function.

Issuance of a special use permit (SUP) by the Forest Service for the proposed use is subject to a determination that the "proposed use will not pose a serious or substantial risk to public health or safety" (36 CFR Part 251[e][iii]). If the Forest Service is unable to make that determination, requisite permits and approvals from the Forest Service will not be granted and the proposed projects will not be constructed.

If effectively mitigated at the project level, other related projects would also not be expected to produce or substantively contribute to the potential for wildfire occurrence. Permit review and enforcement by local fire agencies will ensure compliance with applicable Fire Code and related standards formulated for fire safety. In addition, local, State, and federal agencies have the ability and responsibility to increase annual budgetary allocations in response to identified needs. As such, if the need for additional public services is identified, mechanisms are in place to effectively respond to those needs. Cumulative impacts on public services would, therefore, be less than significant.

Recreation

The proposed projects will produce a short-term impact upon existing recreational resources (e.g., temporary boating and hang gliding restrictions). Upon completion of construction, as stipulated, new recreational facilities will be provided within NFS lands and within the County of Riverside and/or City of Lake Elsinore. Operationally, the LEAPS project will have a substantial beneficial impact with regards to local recreational opportunities. Although the TE/VS Interconnect project does not have a recreational component, as a result of the undergrounding of a section of the transmission lines, will not have a substantial adverse recreational impact.

In accordance with Quimby Act requirements, other development projects in close proximity to the proposed projects are required to dedicate real property for recreational purposes and/or convey in-lieu fees. Compliance with those requirements ensures or provides a mechanism for local entities to expand local recreational opportunities in a manner and in locations consistent with agency standards. Since available recreational facilities will be provided in response to locally identified need, cumulative impacts upon recreational facilities will be less than significant.

Transportation and Traffic

Traffic impacts associated with the proposed projects will primarily be limited to the construction period. During construction, additional traffic, including heavy trucks, will be added to both streets in reasonable proximity to each facility site and to the regional arterial highway system. Construction impacts are short-term in duration and cease upon commencement of operations. Where authorized, temporary and/or permanent access roads will be constructed within the CNF to provide access to certain tower sites. Helicopters will be utilized for both construction and maintenance activities in remote areas inaccessible to vehicles. Some material and equipment will be transported to the general area on trains, including the use of the Camp Pendleton railspur. Once operational, only minimal employee and maintenance-related traffic will be associated with the proposed projects.

¹⁰/ United States Department of Agriculture, Forest Service, Final Environmental Impact Statement Land and Resource Management Plan, Cleveland National Forest, February 1986, p. 3-65.

Other energy-related projects will generate construction traffic in vicinity of each project but would not be anticipated to produce substantive operational traffic. Each of the non-energy projects are subject to compliance with local agency traffic standards, specifying a minimally acceptable level of service (LOS). When LOS conditions deteriorate to below acceptable standards, the permitting land-use entity requires such street improvements (or in-lieu fees) as may be required to return affected intersections and street segments to acceptable levels. As such, cumulative traffic impacts would be less than significant.

Utilities and Service Systems

Although not required for the construction or operation of the LEAPS project, the Applicant has included a number of potable water system upgrades to improve water supplies, services, and emergency storage capacity. The proposed projects are not dependent upon those water improvements.

Waters required for the operation of the LEAPS project will be primarily obtained from Island wells and from tertiary treated effluent produced by the EVMWD and/or by other water districts operating in the general area. The availability of sufficient existing non-potable water resources, as may be required for the projects' operation, has been suitably documented. In addition, non-potable water resources will increase over time as the region continues to develop.

As indicated in their respective urban water management plans, each of the area's water purveyors (e.g., MWD, WMWD, EVMWD) identify sufficient water availability to accommodate each agency's long-range water supply needs. Other related projects undertaken within the jurisdiction of those agencies will need to independently demonstrate the sufficiency of water supplies and adequacy of delivery systems. Individual development projects cannot be approved unless water services can be suitably demonstrated. As such, cumulative utility and service system impacts would be less than significant.

Energy Resources

Other energy-related projects are energy producers and are proposed in response to identified generation and transmission needs. The implementation of those projects will serve to expand the production and delivery of energy resources throughout the region. Each of the non-energy-related projects identified therein are energy consumers and are dependent upon the availability of sufficient, reliable electricity. If energy supplies are disrupted, those projects, as well as other areawide energy consumers, may experience periods of supply interruption.

National, Statewide, and local planning efforts, including the promotion of energy conservation and the development of renewable energy resources, are being conducted in order to ensure the sufficiency of electrical supplies. If new energy facilities and resources can be developed in a time period consistent with need, cumulative impacts upon energy resources would not less than significant.